

**United States Bankruptcy Court  
Eastern District of Pennsylvania**

Eugenia G. Hayes,

*Debtor.*

Chapter 13

Case No. 22-12319-amc

**Motion to Modify Plan After Confirmation**

Debtor Eugenia G. Hayes, by her attorney, moves this Court as follows:

1. The Debtor's plan was confirmed.
2. The Debtor requests that the Court enter an order approving the modified plan filed at ECF No. 65 as the new confirmed plan.
3. The proposed plan adjusts amounts payable to secured creditors following a recent motion for relief, and adjusts payments to cure a recent motion to dismiss filed by the chapter 13 trustee.

For those reasons, the Court must grant relief in the form of order attached, and further in the Debtor's favor if necessary and proper under the law.

Date: April 29, 2024

CIBIK LAW, P.C.

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